



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
324 EAST ELEVENTH STREET  
KANSAS CITY, MISSOURI 64106

*Big River Area*  
MOD 981126899  
17.8

*Pine Ford Proj.*  
4-19-82  
OFFICE OF THE  
REGIONAL ADMINISTRATOR

Colonel Robert J. Dacey, USA  
District Engineer  
U. S. Army Engineer District, St. Louis  
210 Tucker Boulevard, North  
St. Louis, Missouri 63101



Dear Colonel Dacey:

Based upon our discussions on April 19, I understand that both of our agencies share a number of concerns about problems that could be associated with the proposed Pine Ford Project; and we agreed there are a number of questions for which adequate information is not currently available. To assist with your continuing review of this issue, my staff has outlined a few items which we suggest merit further study.

1. We understand that so much mine tailings material has entered the river itself that mine tailings deposits are the primary constituent of the riverbed for several miles downstream of the tailings pile at Desloge, Missouri. Given the probability that this material will gradually migrate downstream, the Pine Ford project will trap and concentrate those tailings. To what extent will this result in a reservoir increasingly contaminated with lead?
2. Because the physical and chemical situation in a reservoir differ from those existing in a river in a free flowing state, to what extent would the amount of lead in solution increase as a result of the project? What, for instance, is the effect on the amount of lead in solution of the reservoir depth, the build up of contaminated silt, and the "turnover" process which would occur twice a year?
3. To what extent would the increase of lead in solution in the reservoir significantly increase the lead content of the Big River downstream, and for what distance downstream?
4. To what extent does the landfill currently in operation on the Desloge tailings site increase the content of lead in the Big River?

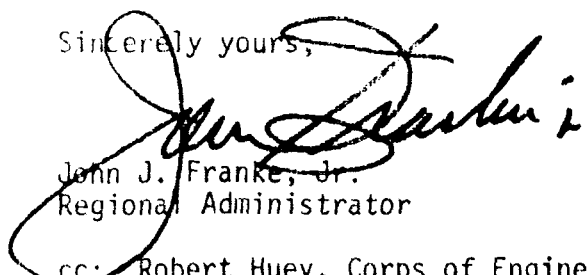
5. Will implementation of the agreement between the Missouri Department of Natural Resources (MDNR) and St. Joe Minerals Corporation provide an ultimate solution to the Desloge tailings site?

6. To what extent is contamination of the river attributable to the existence of additional lead and barite tailings sites on the Big River and its tributaries?

You have asked whether the interpretation by this agency of Clean Water Act Section 102(b) has changed as it relates the inclusion of a value for storage for water quality control in the evaluation of a proposed reservoir. Neither I nor my staff is aware of a national change in policy on this point. I also suggest that in reference to the Pine Ford Reservoir, given the questionable impact on water quality and the stringent statutory criteria which must be satisfied before any water quality benefits can be assigned, the probability of the assignation of any water quality benefits to the construction of the project is extremely low.

I very much appreciate your awareness of and interest in the general water quality problems associated with the lead and barite mine tailings sites on the Big River. We consider it to be an environmental problem of great significance and dimension, and we are very interested in working with your agency, other federal agencies, appropriate state agencies (MDNR has been the lead agency to date), local communities, and anyone else to develop an assessment and an eventual solution. I know that you have done some very preliminary work in this area, and I strongly encourage you to continue your efforts.

Sincerely yours,



John J. Franke, Jr.  
Regional Administrator

cc: Robert Huey, Corps of Engineers, St. Louis  
Robert Schreiber, Missouri Department of Natural Resources